

THE CITY OF NEW YORK

LAW DEPARTMENT

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BY ECF & HAND

Honorable Allyne R. Ross United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

ZACHARY W. CARTER

Corporation Counsel

Re: Lakisha Bryant, et al. v. Mark Serebrenik, et.al.,

15-CV-3762 (ARR) (CLP)

Your Honor:

I am the Senior Counsel assigned to represent defendants Police Officers Mark Serebrenik, Frank Stankevicius, Luis Falcon, Matthew Colon, and Lt. Joseph Palmiotto in the above-referenced matter. Defendants write to respectfully inform the Court that the parties have been unable to agree upon a joint verdict sheet to date. Accordingly, defendants submit their version of the proposed verdict sheet.

Defendants provided a draft of the verdict sheet to plaintiffs yesterday, March 2nd. Plaintiffs provided a new draft of a verdict sheet to defendants' counsel today at 5:00 p.m. Although it appears there is substantial room for agreement, the parties disagree regarding the phrasing and inclusion of certain questions. Defendants attempted to compile the two versions into joint verdict sheet that fairly reflects both parties' positions. However, the parties were unable to agree on a joint version, and, at plaintiffs' counsel's request, defendants agreed to file their proposed verdict sheet in a separate document. It is defendants' understanding that plaintiffs intend to also file their proposed verdict sheet.

I thank the Court for its consideration of the within matters. Respectfully submitted,

/S Aimee K. Lulich Senior Counsel

cc: Cary London, Esq. (By ECF)